

**DISCOVERY PLAN WORKSHEET**  
**Tier 1 Pre-Settlement Discovery**

Deadline for Completion of Rule 26(a) initial disclosures  
and HIPAA-compliant records authorizations: May 26, 2017

Completion date for Phase 1 Discovery  
as agreed upon by the parties June 12, 2017  
*(Reciprocal and agreed upon document production  
generally not including depositions, unless otherwise agreed.  
No more than 30 days after Initial Conference).*

Status Conference TBD by the Court: \_\_\_\_\_  
*(Generally 15 days post Tier 1 Discovery)*

**Tier II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings: July 27, 2017  
*(Presumptively 15 days post status conference)*

First requests for production of documents  
and for interrogatories due by: August 14, 2017  
*(Presumptively 15 days post joining/amending)*

All fact discovery completed by: December 1, 2017  
*(Presumptively 3.5 months post first  
requests for documents/interrogatories)*

Exchange of expert reports completed by: January 2, 2018  
*(Presumptively 30 days post fact discovery)*

Expert depositions completed by: February 2, 2018  
*(Presumptively 30 days post expert reports)*

Final date to take first step in dispositive motion practice: March 6, 2018  
*(Parties are directed to consult the District Judge's  
individual rules regarding such motion practice.  
Presumptively 30 days post expert depositions)*

COMPLETION OF ALL DISCOVERY BY: February 12, 2018  
*(Note: Presumptively 9 months after Initial Conference).*

Submission of joint pretrial order: \_\_\_\_\_

Final Pretrial Conference TBD by the court: \_\_\_\_\_